

ALVERSON, TAYLOR,
MORTENSEN & SANDERS
 KURT R. BONDS, ESQ.
 Nevada Bar #6228
 MATTHEW M. PRUITT, ESQ.
 Nevada Bar #12474
 7401 W. Charleston Boulevard
 Las Vegas, NV 89117
 (702) 384-7000
efile@alversontaylor.com

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

*

EDWARD STOLZ, an individual,

Plaintiff,

v.

SAFECO INSURANCE COMPANY OF
AMERICA, a New Hampshire corporation;
DOES I through X, ROE CORPORATIONS
XI through xx;

Defendants.

CASE NO.: 2:14-cv-02060-RFB-NJK

**STIPULATION AND ORDER TO
EXTEND TIME FOR PARTIES TO
FILE REPLIES TO MOTIONS FOR
SUMMARY JUDGMENT**

[THIRD REQUEST]

COME NOW, Plaintiff, EDWARD STOLZ, by and through his counsel of record, the law firm ALVERSON, TAYLOR, MORTENSEN & SANDERS, and Defendant, SAFECO INSURANCE COMPANY OF AMERICA, by and through its counsel of record, the law firm of KOELLER, NEBEKER, CARLSON & HALUCK, LLP, and hereby stipulate to extend the time for each to file their Replies to one another's respective Motions for Summary Judgment filed in the above-entitled matter.

Each party filed their own Motion for Summary Judgment on January 8, 2016. Oppositions to the respective Motions were filed by the parties on February 16, 2016. (*See*, Court Documents Nos.

42, 43, 46 and 47, on-file herein). On March 1, 2016, this Court granted the parties' Stipulation to extend Replies to the respective Motions to allow for potential informal settlement negotiations and mediation and/or a settlement conference. (*See*, Court Document No. 49, on-file, herein).

The Court again granted the parties' Second Stipulation to extend Replies of the respective Motions on April 26, 2016 due to unexpected scheduling concerns which made scheduling mediation more difficult than anticipated. The parties attempted to reschedule mediation as soon as possible in order to meet the new Reply Deadlines of Friday, July 1, 2016; however, they have been unable to find a date which has worked for both parties. Plaintiff is not currently a resident of Nevada and has been required in his business to travel over the summer to places outside Nevada. Notwithstanding, the parties have found and scheduled a date for mediation for August 19, 2016.

The parties hereby request an Order from this Court memorializing that Replies to each party's Motion for Summary Judgment are now due by or before September 19, 2016, with the joint status report, currently due by July 8, 2016, to be due on or before September 26, 2016.

ALVERSON, TAYLOR,
MORTENSEN & SANDERS

KOELLER, NEBEKER, CARLSON
& HALLUCK, LLP

// S// Matthew M. Pruitt
KURT R. BONDS, ESQ.
Nevada Bar #6228
MATTHEW M. PRUITT, ESQ.
Nevada Bar #12474
7401 W. Charleston Boulevard
Las Vegas, NV 89117
Attorneys for Plaintiff,
EDWARD STOLZ

// S// David M. Gould
DAVID M. GOULD, ESQ.
Nevada Bar #11143
300 South Fourth Street, Suite 500
Las Vegas, NV 89101
Attorneys for Defendant,
SAFECO INSURANCE COMPANY OF
AMERICA

ORDER

IT IS HEREBY ORDERED that the time for each party to file its Reply in support of the presently pending Motions for Summary Judgment (Court Documents Nos. 42, 43, 46 and 47, on-file herein) is extended until **September 19, 2016**. The parties will also submit a joint status report to this Court regarding any pending motions by **September 26, 2016**.



RICHARD F. BOULWARE, II
United States District Judge

DATED: July 1, 2016.

Respectfully submitted by:

ALVERSON, TAYLOR,
MORTENSEN & SANDERS

// S// Matthew M. Pruitt
KURT R. BONDS, ESQ.
Nevada Bar #6228
MATTHEW M. PRUITT, ESQ.
Nevada Bar #12474
7401 W. Charleston Boulevard
Las Vegas, NV 89117
Attorneys for Plaintiff,
EDWARD STOLZ

N:\kurt.grp\CLIENTS\22500\22522\pleading\22522 - Stip and Order Extending Reply Deadlines Third Request.doc

ALVERSON, TAYLOR, MORTENSEN & SANDERS

LAWYERS
7401 WEST CHARLESTON BOULEVARD
LAS VEGAS, NEVADA 89117-1401
(702) 384-7000